

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 09/10/2021

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September 10, 2021

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Thorne v. Eka's Flowers Inc.*,
Case No.: 1:21-cv-4481

Dear Judge Caproni,

The undersigned represents Braulio Thorne, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Eka's Flowers Inc., ("Defendant"). Pursuant to Your Honor's Individual Rule 2.C, the undersigned respectfully requests that the Initial Conference currently scheduled for September 17, 2021 at 10:00 AM (Dkt. 6) be adjourned for 30 days because the Defendant has not yet answered or appeared in this Action. The undersigned sincerely apologizes for the lateness of this request, however in the interest of fairness to the Defendant, we would like to grant them additional time to appear so that they can properly be represented in this matter. The undersigned has been in contact with an employee for the Defendant and we were informed the Defendant will be contacting us shortly. This is the Plaintiff's first request for an adjournment in this matter. The undersigned proposes the following dates, October 8, 2021, October 15, 2021, October 22, 2021, October 29, 2021 and Novmeber 5th, 2021.

Additionally, the Complaint was filed on May 18, 2021 (Dkt. 1) and the Defendant was served May 26, 2021 (Dkt.7), therefore the undersigned respectfully requests the deadline for the Defendant to Answer be extended until October 25, 2021 to allow the Defendant to retain counsel and appear in this matter.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

Application DENIED. The initial pretrial conference will proceed on the date scheduled. Due to a conflict in the Court's calendar, the conference is adjourned by a half hour. The conference will be held on **Friday, September 17, 2021 at 10:30 A.M.**

The conference will be held remotely. All parties and any interested members of the public must attend by dialing 1-888-363-4749, using the access code 3121171, and the security code 4481. All attendees are advised to mute their phones when not speaking and to self-identify each time they speak. Recording or rebroadcasting the proceeding is strictly prohibited by law.

Plaintiff must serve this endorsement on Defendant and file proof of service on the docket by no later than **Tuesday, September 14, 2021.**

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

Date: September 10, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE